

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

CENTRAL STATES TRUCKING CO.

Plaintiff,

v.

ANDREA MORGAN, AMBER SMALL AND
TIGER TRANS LLC

Defendants.

CIVIL ACTION FILE NO.

4:20-CV-00145-WTM-CLR

CONSENT INTERLOCUTORY INJUNCTION ORDER

Upon agreement of the parties:

IT IS HEREBY ORDERED AND DECREED THAT:

1. Defendants are enjoined and restrained, directly or indirectly, and whether alone or in concert with others, until further Order of this Court or the expiration of sixty (60) days from August 8th, 2020, from:

- a) as to Defendant Morgan soliciting, contacting, calling upon or otherwise providing any services to any customer of Plaintiff with which Defendant Morgan had business contact during the last twelve (12) months of her employment with Plaintiff, with a view toward the sale or providing of any service or product competitive with any service or product sold or provided by Plaintiff during Defendant's employment with Plaintiff. Plaintiff is to provide Defendants with a list of such customers.

Customers with whom Defendant Tiger Trans, LLC had a relationship prior to April 1, 2020, are not included in this Order.

- b) as to Defendant Morgan, soliciting or encouraging any current employee or independent contractor of Plaintiff to leave Plaintiff's employ or otherwise perform services for or on behalf of Defendants; and
- c) as to all Defendants, using, distributing, disclosing, publishing or otherwise disseminating any of Plaintiff's Confidential Information (as those terms are defined by Morgan's Non-Solicitation and Confidentiality Agreement ("Agreement"), a copy of which is attached as Exhibit "A" to this Order and applicable Georgia law).

2. Defendants Morgan and Small are prohibited from deleting, destroying or otherwise modifying or removing any data or computer program on the computer equipment used by Defendants Morgan and Small to receive the information identified on Exhibits 3 through 57 submitted in support of Plaintiff's Motion for a Preliminary Injunction, from the date of this Order until after this computer equipment has been imaged for inspection and analysis by a third party computer forensic expert paid for by Plaintiff and agreed to by Defendants. The digital imaging shall be carried out as follows:

- a. no information or data shall be added to, or removed from, the equipment;
- b. it shall be completed as soon as possible, and in any event within 48 hours after Defendants deliver the computer equipment to the third-party forensic expert;
- c. the computer equipment shall be returned to Defendants upon completion of the imaging process;
- d. the examiner shall make two images of the equipment at issue: (1) counsel for

Plaintiff shall be given one copy; and (2) counsel for Defendants, or Defendants themselves, shall be provided with another copy.

3. The parties may engage in expedited discovery by requiring the production of documents on fifteen (15) days' notice; and depositions of parties and non-parties on five (5) days' notice.

4. This Order shall expire by its own terms after sixty (60) days, unless otherwise extended by the Court.

SO ORDERED THIS 8th day of August, 2020 at 1 o'clock P..m.



Judge, United States District Court
Southern District of Georgia

Prepared and Submitted By:

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